

**MARQUIS & AURBACH**  
CRAIG R. ANDERSON, ESQ.  
Nevada Bar No. 6882  
JOSHUA L. BENSON, ESQ.  
Nevada Bar No. 10514  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
Telephone: (702) 382-0711  
Facsimile: (702) 382-5816  
[canderson@marquisaurbach.com](mailto:canderson@marquisaurbach.com)  
[jbenson@marquisaurbach.com](mailto:jbenson@marquisaurbach.com)  
Attorneys for Defendants LVMPD,  
Eager & Frederick

**UNITED STATES DISTRICT COURT**

**STATE OF NEVADA**

JOYCE ZAIC,

Plaintiff,

Case No: 2:10-cv-01814-PMP-LRL

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, a political subdivision of the  
STATE OF NEVADA; DANIELLE PIEPER,  
individually; B. EAGER, P#6189, individually  
and in his official capacity as a police officer; T.  
FREDERICK, P#9793, individually and in his  
official capacity as a police officer; SUNRISE  
MOUNTAIN VIEW HOSPITAL, INC.; NEAL,  
a security guard for MOUNTAIN VIEW  
HOSPITAL; CHRISTOPHER SIMMS, security  
guard for MOUNTAIN VIEW HOSPITAL;  
JOHN DOES I through X and ROE  
INSTITUTIONS I through X, inclusive,

Defendants.

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT, B. EAGER, AND T.  
FREDERICK'S REMOVAL STATEMENT**

Pursuant to the United States District Court's October 19, 2010 Minute Order concerning removal, a copy of which is attached hereto, Defendant, Las Vegas Metropolitan Police Department, B. Eager and T. Frederick's ("Defendants"), by and through their attorneys of record, Marquis & Aurbach, hereby provides the following statement:

Las Vegas, Nevada 89145

(702) 382-0711 FAX: (702) 382-5816